

A05-0048

JAN 31 2002

Application Form

Name of facility

Nishikawa Rubber Company & Cooper Standard Automotive

Name of parent company (if any)

2808 Adams Center Road

Street address

Street address (continued)

Fort Wayne, IN 46803

City/State/Zip code

Give us information about your contact person for the
National Environmental Performance Track Program.

Name CoLette Schlegel

Title Environmental Health and Safety Coordinator & Systems Coordinator ISO 14001/QS9000

Phone (219) 493-7938

Fax (219) 493-3905

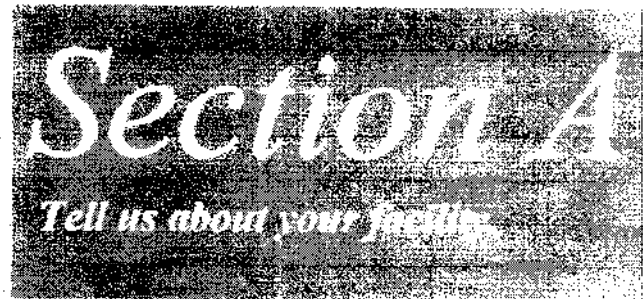
E-mail cschlegel@cooperstandard.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

We are a Tier I supplier of dynamic rubber weather-stripping to the automotive industry.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3069

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

INR000002782

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

See attached listing

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

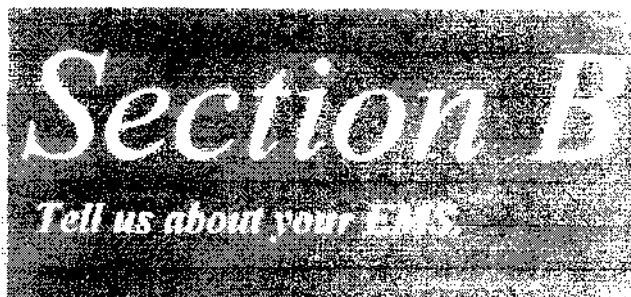
2001 Governor's Award for Pollution Prevention
2001 & 2000 Governor's Award for Recycling
2001 Honorable mention for Allen County's Excellence in Recycling
2000 City of Fort Wayne Expansion Award
2000 Business of the Year for Commitment to the New Haven Community
Certification to ISO 14001 (Dec 1999)

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Performance Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|--|---|
| <i>a.</i> Environmental policy | <input checked="" type="checkbox"/> Yes |
| <i>b.</i> Planning | <input checked="" type="checkbox"/> Yes |
| <i>c.</i> Implementation and operation | <input checked="" type="checkbox"/> Yes |
| <i>d.</i> Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| <i>e.</i> Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Waste	8,520	lbs.	2,762	lbs
<p>i. How is the current level an improvement over the previous level?</p> <p>We have decreased the amount of hazardous waste by 68% and at the same time we have increased the amount of rubber we process by 32%</p> <p>ii. How did you achieve this improvement?</p> <p>The majority of this decrease was accomplished by means of source reduction. We have made technological advances as well as process changes.</p>				

A handwritten signature in black ink, appearing to read "J. L. Mockel".

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Hazardous air emissions	Quantity 11,653	Units lbs	Quantity 3,671	Units lbs
<p>i. How is the current level an improvement over the previous level?</p> <p>We have decreased the amount of hazardous air emissions by 68% and at the same time we have increased the amount of rubber we process by 32%</p>				
<p>ii. How did you achieve this improvement?</p> <p>We currently are using more water base coatings versus solvent based coatings.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? **Total Energy Use**
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output **1.08387 KWH/per lb of rubber processed (Quantity/Units)**

John Mochel

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

1.07899 KWH/per lb of
rubber processed
(Quantity/Units)

e. How will you achieve this improvement?

Our three year goal is to reduce the current level. We have numerous new programs to launch over the next three years. New equipment has been purchased to facilitate the increase in business and at the same time allow us to become more efficient in our energy consumption.

Second aspect you've selected

a. What is the aspect?

Emissions of VOCs

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

0.00202 lbs/per lb of
rubber processed
(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☐ Option A:
Absolute value

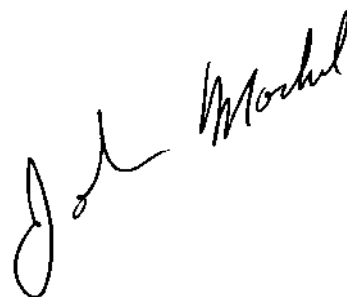
(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

0.00160 lbs/per lb of
rubber processed
(Quantity/Units)

e. How will you achieve this improvement?

New launches will be using water base coatings. New technology will allow to become more efficient during the application process.



Third aspect you've selected

- a. What is the aspect? Total solid waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|---------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 748,466 lbs
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- | | |
|---|---------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 648,466 lbs
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement?
- Our three year goal is to reduce the current level. We have numerous new programs to launch over the next three years. New equipment has been purchased to facilitate the increase in business and at the same time allow us to become more efficient in our processes. We are also investigating reuse processes.

Fourth aspect you've selected

- a. What is the aspect? Hazardous solid waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 2,762 lbs
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- | | |
|---|--------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 2,220 Lbs.
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement?
- Source reduction should allow us to reduce current levels during our new product launches over the next three years.



Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section B

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Our EMS program includes a stakeholder group. This group included people from the following professions;

teachers, local government engineer, local county pollution prevention, state IDEM representative. This group was asked straight out what environmental aspects they would like to see reduced. During our pre-launch, meetings with our local officials have been conducted. We would also refer to our "External Communications" procedure regarding community communications.

2 How do you inform community members of important matters that affect them?

Meetings our conducted with our local government. We also participate in public notifications as required, regarding permit issues. Copies of our "Integrated Contingency Plan" are submitted to the local government, fire department, and police department to assist them incase of an emergency situation.

3 How will you make the Performance Track Annual Performance Report available to the public?

- ☐ Website www.
- ☐ Newspaper
- ☐ Open Houses
- ☒ Other

The report will be communicated according to our external communications procedure. This does not exclude any of the forms stated above.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Allen County Solid Waste District	Anthony Burrus	(219) 449-7265
<i>State/Local Regulator</i>	IDEM	Marc Hancock	(317) 233-6663
<i>Other community/local reference</i>	City of New Haven	Mayor Terry McDonald	(219) 749-5720

Section E

Application and Participation Statement.

On behalf of The Nishikawa Standard Company
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Performance Track Program Guide* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date



Printed Name/Title John Mochel/Plant Manager

Facility Name Nishikawa Standard Company - New Haven Facility

Facility Street Address 2808 Adams Center Road

Facility ID Numbers EAP INR0000027822

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
4th Floor
Cambridge, MA 02140

National Environmental Performance Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, *Tell us about your facility*. The Checklist will help you identify the *major* federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application.

Air Pollution Regulations

Check all that apply.

- ☒ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☒ 3. General Emission Standards, Prohibitions, and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☐ 7. Control of VOCs
- ☐ 8. Sampling, Testing, and Reporting
- ☐ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☐ 13. Other (you must list these) Federal, State, Tribal, or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check all that apply.

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☐ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☐ - Pre-transport Requirements
 - ☒ - Record-keeping/Reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer Facility Requirements
 - ☐ - Manifest System and Record-keeping
 - ☐ - Hazardous Waste Discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - ☐ - General Facility Standards
 - ☐ - Preparedness and Prevention
 - ☐ - Contingency Plan and Emergency Procedures

- ☐ - Manifest System, Record-keeping and Reporting
- ☐ - Groundwater Protection
- ☐ - Financial Requirements
- ☐ - Use and Management of Containers
- ☐ - Tanks
- ☐ - Waste Piles
- ☐ - Land Treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Hazardous Waste Permit Program (Part B) (40 CFR 270)
- ☐ 8. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Hazardous Materials Management

Check all that apply.

- ☐ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Solid Waste Management

Check all that apply.

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☐ 4. Solid Waste Storage and Removal Requirements
- ☒ 5. Disposal Requirements for Special Wastes
- ☐ 6. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Water Pollution Control Requirements

Check all that apply.

- ☐ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☐ 2. Designation of Hazardous Substances (40 CFR 116)

- ☐ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☐ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW City of Fort Wayne
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☐ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☐ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☒ 15. Oil Discharge Containment, Control, and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☐ 17. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Drinking Water Regulations

Check all that apply.

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check all that apply.

- ☐ 1. Manufacture and Import of Chemicals, Record-keeping, and Reporting Requirements (40 CFR 704)
- ☒ 2. Import and Export of Chemicals (40 CFR 707)
- ☒ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)

- ☒ 4. Chemical Information Rules (40 CFR 712)
- ☒ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-manufacture Notifications (40 CFR 720)
- ☒ 7. PCB Distribution Use, Storage, and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)
- ☐ 10. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides
- ☐ 9. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Environmental Clean-Up, Restoration, Corrective Action

Check all that apply.

- ☐ 1. Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). Please identify.
- ☐ 2. RCRA Corrective Action
- ☐ 3. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Facility Name Nishikawa Standard Company
Facility Location: 2808 Adams Center Road Fort Wayne, IN 46803
Facility ID Number(s): EPA: INR 000002782